IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

RONDELLTE FRAZIER, Individually and on behalf of all others similarly situated,	§	
Plaintiff,	§	**NO. 3:16-cv-02657-M**
vs.	§	
DALLAS/FORT WORTH INTERNATIONAL AIRPORT BOARD; THE JOINT VENTURE MANHATTAN/BYRNE/JRT/3i; WELLS GLOBAL, LLC; EAS CONTRACTING, LP; HAYDON BUILDING CORP.; PHILLIPS/MAY CORPORATION; AND BALFOUR BEATTY CONSTRUCTION CORPORATION	§	
Defendants.	§	

DEFENDANT'S MOTION TO DISMISS

Defendant Balfour Beatty Construction Corporation ("Defendant") moves to dismiss Plaintiff Rondellte Frazier's Original Collective Action Complaint pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure. In support of this Motion, Defendant contemporaneously files a Brief in Support of Motion to Dismiss ("Brief"). For reasons discussed in Defendant's Brief, Defendant requests the Court grant Defendant's Motion to Dismiss.

WHEREFORE, Defendant respectfully request that this Court grant their Motion to Dismiss, and award such other and further relief to which they are entitled.

Respectfully submitted,

/s/ Jennifer Youpa

Jennifer Youpa
Texas Bar No. 01383400
jyoupa@littler.com
Kim Rives Miers
Texas Bar No. 24041482
kmiers@littler.com

LITTLER MENDELSON, P.C.
2001 Ross Avenue
Suite 1500, Lock Box 116
Dallas, TX 75201-2931
214.880.8100
214.880.0181 (Facsimile)

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

On October 18, 2016, I filed the foregoing with the Court and served to counsel:

Chris R. Miltenberger
The Law Office of Chris R. Miltenberger, PLLC
1340 N. White Chapel, Suite 100
Southlake, TX 76092-4322

/s/ Jennifer Youpa
Jennifer Youpa

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